

## **Cal/EPA Environmental Justice Action Plan**

### **Pilot Project Summary for Illegal Drug Lab Risk Reduction Project**

**May 18, 2005**

**I. Lead Agency:** Department of Toxic Substances Control (DTSC)

**II. Project Area:** A community within the East Bay area (e.g., the City of Hayward *or* the City of Oakland). DTSC will assist in the development of a community-based Local Advisory Group (LAG). The LAG membership will include interested or affected community members, environmental advocates, local regulatory agencies and city, county and state representatives.

#### **Area Demographics:**

- Hayward: 11% African-American; 19% Asian; 34% Hispanic or Latino (of any race); 43% White; 25% under the age of 18; median household income: \$51,000; below poverty level: 7%
- Oakland: 36% African-American; 15% Asian; 22%; Hispanic or Latino (of any race); 31% White; 25%; under the age of 18; median household income \$44,000; below poverty level: 19%

**III. Background:** Approximately 1,200 illegal drug labs are seized each year by law enforcement agencies. These labs, which manufacture the drug methamphetamine, typically contain a variety of illegal and dangerous substances. The State and (to a lesser extent) federal government, provide support to law enforcement officials by removing the visible signs of these substances from the dwelling (often homes, apartments or motel rooms) where the lab operated. This gross contamination is removed by qualified professionals and disposed according to the waste's characteristics. What remains in the dwelling is unknown; however, sufficient information exists to indicate that the permanent features of a dwelling, such as the wallboard, flooring, ventilation and septic systems may remain contaminated with substances that may continue to pose a risk to occupants. The majority of these illegal drug labs are located in communities where the residents do not have the financial resources or the political influence to effectively address this problem. DTSC proposes to explore a number of possible precautionary approaches which could dramatically reduce exposures to remaining contaminants, especially among children, thereby reducing cumulative impacts. Children are the focus of this project because of their proximity to contaminated surfaces such as (e.g., floor coverings), their prolonged duration of exposure, and their sensitivity and susceptibility to some of the remaining chemicals. Children who subsequently live in these dwellings may be exposed to chemicals such as ammonia, phosphine, iodine, hydrogen chloride, red phosphorous, methamphetamine and other substances if adequate remedial measures are not implemented. These chemicals present a variety of potential health problems.

**IV. Project Start Date:** May 2005

**V. Project End Date:** December 2006

## VI. Goal & Objectives:

- a. **Goal:** Provide communities with information that will help them identify existing and former drug lab sites. Identify and publicize cost-effective, precautionary approaches to reduce residual contamination from illegal drug labs which may be present in a dwelling after gross contamination has been removed. Reducing the levels of contamination in homes will, in turn, reduce the cumulative impacts to health resulting from exposures to pollutants from all other sources and all media.
- b. **Objectives:**
  - Identify contaminants associated with drug lab activity which pose significant threats to children.
  - Identify various precautionary approaches currently used statewide, and implement and test the effectiveness of selected approaches to reduce or eliminate the remaining contamination.
  - Provide a written description of the most effective approach identified, including a step-by-step explanation of the materials and methods, and provide information that will help communities identify existing and former drug lab sites.
  - Ensure statewide availability of this information via printed materials and the Internet.

## VII. Activities – Planning, Implementation, Evaluation, & Deliverables

### Planning

- **Site Selection:** DTSC examined its database of illegal drug lab removal activities and identified five cities (Antioch, Hayward, Oakland, Oakley, and San Jose) with the greatest number of seizures reported in the nine Bay Area counties. From this list, DTSC Public Participation staff identified the cities of Hayward and Oakland as prospective areas of focus using the following criteria: a community which faced the greatest number of environmental challenges; had a history of community activism; and current existence of organizations within the community to respond to environmental concerns.

Although DTSC will seek to carry out the research element of this project in one of those locations, DTSC is prepared to conduct that research in other East Bay area communities if no locations appropriate for that research are discovered in the communities of Hayward or Oakland within the timeframe necessary to complete this project on schedule.

- **Reduction of Risk to Children's Health:** It is likely that the greatest exposure to residual contamination in illegal drug labs is to children. Children are likely to come into contact with contaminated surfaces such as carpeting, wall boards, and furniture more often than adults. Children may spend a greater part of their day in the drug lab dwelling. It is difficult to measure the actual health effects from these contaminants because there may be a number of other environmental factors, both inside and outside the home, that also pose potential health risks and contribute to cumulative health impacts. Thus, DTSC will measure the actual

reduction in the level of contamination for the specific contaminants identified.

- **Cal/EPA Cross-Media Implication:** Reducing contamination associated with direct contact to illegal and dangerous drug lab chemicals may lead to the ability to address reductions in exposures through other routes such as inhalation of contaminants circulated through heating and cooling systems. DTSC will work with other entities to identify cross-media opportunities as the project proceeds.
- **Partnerships:** DTSC will work collaboratively with local Environmental Health Departments and the County Medical Officers. Community support is critical to ensure building owner/tenant participation as well as acceptance and implementation of the project's recommendations.

## **VIII. Implementation**

- **Methodology & Performance Indicators:** DTSC will (1) conduct surveys to identify precautionary approaches used throughout California, and their effectiveness; (2) after removal of gross contamination from discovered drug lab sites using State or federal resources, test selected precautionary approaches and conduct scientific tests to identify which of those approaches are most cost-effective in reducing exposures via contact with contaminants remaining on hard surfaces, thereby reducing overall cumulative impacts to children's health; and (3) develop, publish, and distribute guidance materials to help communities identify existing and former drug lab locations, and materials that provide a step-by-step explanation of precautionary procedures to address residual contamination in former drug lab sites.
- **Public Participation:** DTSC will conduct focused workshops in the City of Hayward, and the City of Oakland. Community and local government participation will be requested.

## IX. Project Work Plan & Timeline:

	Activity	Start Date	End Date
Phase 1	1. Identify pilot project location(s)	2 <sup>nd</sup> Qtr 2005	Ongoing
	2. Define project parameters	2 <sup>nd</sup> Qtr 2005	2 <sup>nd</sup> Qtr 2005
Phase 2	1. Establish Local Advisory Groups (LAGs)	2 <sup>nd</sup> Qtr 2005	2 <sup>nd</sup> Qtr 2005
	2. Collect Project Data	3 <sup>rd</sup> Qtr 2005	Ongoing
	3. Identify Project Data Gaps	1st Qtr 2006	Ongoing
Phase 3	1. Develop Children's Environmental Risk Reduction Plan (ChERRP)	1 <sup>st</sup> Qtr 2006	1 <sup>st</sup> Qtr 2006
Phase 4	1. Implement ChERRP	2 <sup>nd</sup> Qtr 2006	2 <sup>nd</sup> Qtr 2006
Phase 5	1. Evaluate ChERRP	3 <sup>rd</sup> Qtr 2006	3 <sup>rd</sup> Qtr 2006
	2. Explore implementation options of project	4 <sup>th</sup> Qtr 2006	4 <sup>th</sup> Qtr 2006

## X. Evaluation & Deliverables

**Results:** While it is not possible within the timeframe of the project to demonstrate an improvement in the health of the community due to a reduction in exposure to contaminants associated with illegal drug labs, DTSC will measure specific contaminant reductions. The availability of those data along with the specific steps to achieve this reduction will be beneficial to all communities struggling with the presence of contaminated housing and other structures.

- **Deliverables:** This project will lead to three deliverables:
  - A statewide survey of existing precautionary practices and their effectiveness;
  - A scientific evaluation of selected approaches and the identification of the most cost-effective of those; and
  - Publication and distribution of guidance materials that help communities identify existing and former drug lab sites, and provide a step-by-step description of cost-effective, precautionary procedures to reduce exposures to contaminants remaining on hard surfaces at former drug lab sites, therefore reducing cumulative impacts of exposures to chemicals in all environmental media

- **Considerations, Anticipated Challenges/Constraints:** Several States in the nation have attempted to develop standards for drug lab cleanups. These efforts have been extremely difficult and time consuming resulting in no known health-based standards. This project takes a different approach and views success as a significant reduction in the levels of contamination, rather than compliance with a cleanup level which has been established as health protective.

## **XI. For More Information:**

### **Comments, Questions, or Concerns regarding this Pilot?**

Please direct comments, questions, or concerns to:

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## **XII. Project Contacts:**

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